

ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

RECEIVED

In the Matter of )  
)  
Amendment of Section 73.202(b) )  
Table of Allotments, )  
FM Broadcast Stations )  
(Sells, Arizona) )

MB Docket No. 02-376  
RM - 10617

JAN 30 2003

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To: Assistant Chief, Audio Division  
Office of Broadcast License Policy  
Media Bureau

DOCKET FILE COPY ORIGINAL

**COUNTERPROPOSAL**

Lakeshore Media, LLC ("Lakeshore"), licensee of Station KWCX-FM, Willcox, Arizona, by its counsel, hereby requests the Commission amend the **FM** Table of Allotments to substitute Channel 285C3 at Davis-Monthan Air Force Base, Arizona for Channel 285C2 at Willcox, Arizona and modify the station license accordingly. If this counterproposal is granted, Lakeshore will file an application to modify the KWCX-FM license to specify operation on Channel 285C3 at Davis-Monthan Air Force Base as a first local service. The allotment of Channel 285C3 as proposed is in conflict with the Sells, Arizona proposal for Channel 285A as set forth in the Notice of Proposed Rule Making, DA 02-3361, released December 9, 2002. With respect thereto, the following is submitted:

**I. DAVIS-MONTHAN AIR FORCE BASE**

**A. TECHNICAL ANALYSIS**

I. As demonstrated in the attached Engineering Statement, Channel 285C3 can be allotted to Davis-Monthan Air Force Base consistent with Section 73.207 of the commission's Rules and the 1992 U.S./Mexican FM Broadcast Agreement. See Figures 1 and 2. The

014

Engineering Statement demonstrates that a 70 dBu signal can be provided to Davis-Monthan Air Force Base from the proposed reference point. See Figure 3.

2. The proposed 60 dBu contour will provide service to 813,043 persons. The existing KWCX-FM facility provides service to 13,045 persons, resulting in a net gain in population of 799,998 persons. See Figure 4. Portions of the loss area are served by as many as ten existing or proposed services. See Figures 5 & 6. There are unserved and underserved areas created but these areas will be provided service by the proposed allotments of Channel 283C2 and 245C2 at Willcox, as described herein.

3. In order to allot Channel 285C3 to Davis-Monthan Air Force Base at the proposed coordinates, Station KZZP, Mesa, Arizona, on Channel 284C, must change its transmitter site reference coordinates. Station KZZP is licensed to Citicasters Licenses, L.P. ("Citicasters"). Citicasters has provided a statement that it is willing to change its transmitter site coordinates should Channel 285C3 be allotted to Davis-Monthan Air Force Base, as proposed. See Exhibit 1. The Engineering Statement indicates that Channel 284C can be allotted at the new site in compliance with Section 71.207 of the Commission's Rules. See Figures 16-18. Lakeshore hereby states it will reimburse Citicasters for the reasonable costs of changing its transmitter site to the extent necessary under the Commission's spacing rules.

4. The allotment of Channel 285C3 to Davis-Monthan Air Force Base from the proposed reference point would be short spaced to Station XHNI-FM, Nogales, Sonora, Mexico. However, under the 1992 FM Broadcasting Treaty between the U.S. and Mexico, and as demonstrated in the Engineering Statement, contour protection to Station XHNI-FM can be provided. See Figure 2.

## **B. CHANGE IN COMMUNITY OF LICENSE**

5. Petitioner desires to change its community of license from Willcox to Davis-Monthan Air Force Base, Aril-ona to provide a first local service under the prerequisites set forth in Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 3870 (1989), recons. granted in part, 5 FCC Rcd 7094 (1990). First the proposed use of Channel 285C3 at Davis-Monthan Air Force Base is mutually exclusive with the current use of Channel 285C2 at Willcox. See Figure 1. Second, the Davis-Monthan Air Force Base proposal is preferred under the Commission's priorities because it would receive a first local service (Priority 3) while Willcox would retain local service from KHIL(AM) 1250 kHz (Priority 4). See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982).

6. The Commission has repeatedly held that military bases may be communities for allotment purposes. See Johannesburg and Edwards, California, 15 FCC Rcd 15801 (2000) (Edwards Air Force Base); Bon Air, Chesicr, Mechanicsville, Ruckersville, Williamsburg and Fort Lee, Virginia, 11 FCC Rcd 5758 (1996) (Fort Lee); Fort Rucker and Geneva, Alabama. and Blakely, Georgia, 5 FCC Rcd 37 (1990) (Fort Rucker). Indeed, in Bon Air, supra, the Commission held that the Fort Lee, Vii-ginia military base was sufficiently independent of Petersburg to warrant a first local preference under the criteria set forth in Faye and Richard Tuck, 3 FCC Rcd 5374 (1988). That analysis governs this case as well.

7. Davis-Monthan Air Force Base is located within the Tucson, Arizona Urbanized Area. Therefore, a Tuck Showing is provided. The Commission considers the extent the Station will provide service to the entire Urbanized Area, the relative populations and proximity of the suburban and central city, and, most importantly, the independence of the suburban community.

Tuck, supra. In this case, the population of Davis-Monthan Air Force Base is 6,898,<sup>1</sup> which is 1.4 percent of the population of Tucson (468,699). The Air Force Base is located in Pima County adjacent to the city of Tucson. In any event, the Commission has repeatedly stated that these factors are less important than evidence of independence. See Headland, Alabama and Chattahoochee, Florida, 10 FCC Rcd 10352 (1995).

8. With respect to independence, the Commission does not require that all eight factors favor the independence of the suburban community. A majority of the factors is sufficient for a finding of independence. Parker and Port St. Joe, Florida, 11 FCC Rcd 1095 (1996); Jupiter and Hobc Sound, Florida, 12 FCC Rcd 3570 (1997). In this case, a majority of the Tuck factors demonstrates the independence of Davis-Monthan Air Force Base from Tucson.

(1) *Extent to which the residents of Davis-Monthan Air Force Base, Arizona, work on the Base.* According to Staff Sgt. Wickwirc of the Davis-Monthan Air Force Base Public Affairs Office, the current population figures for the base are contained in its "Economic Impact Report." She quoted the following numbers: (a) approximately 6,500 military personnel are assigned to Davis-Monthan Air Force Base; (b) approximately 2,000 of those personnel live on the base; and (c) approximately 6,000 military and 1,700 civilians employees work at the base. See Exhibit 3. Therefore, it is evident that nearly all of the residents in the military work on the base, and significant numbers of employees are drawn from the surrounding areas.

(2) *Newspapers and other media that cover Davis-Monthan Air Force Base's needs and interests.* The *Desert Airman* is the Davis-Monthan Air Force Base's weekly base

---

<sup>1</sup> The area occupied by Davis-Monthan Air Force Base is designated as Pima County Census Tract 36. See Exhibit 2, p. 8. U.S. Census 2000 tables give the population of that census tract as 6,898. *Id.* According to an official with the Tucson Comprehensive Planning Task Force, the base occupies the entire census tract except for a small area associated with the Arizona Training Program, a school for disabled children. The

newspaper. The newspaper is staffed by the 355<sup>th</sup> Wing Public Affairs and published by the Acrotech News and Review every Friday. It has a circulation of over 30,000. The paper maintains its own webpage at <[www.dm.af.mil/pa/news/default.htm](http://www.dm.af.mil/pa/news/default.htm)>. By accessing this webpage, base residents may access a wide variety of facts and events concerning the base, including information regarding base officials, public services, public and committee meetings, development, job opportunities, schools and community events. In addition to the *Desert Airman*, *The 12<sup>th</sup> Edition*, is the Twelfth Air Force supplement to the *Desert Airman*. Sample pages are attached. See Exhibit 3.

(3) *Community leaders and residents perceive Davis-Monthan Air Force Base as being separate from Tucson.* Davis-Monthan Air Force Base has its own unique identity and history that are separate from those of Tucson. The base has a long history as a former bomber base and as a current active combat wing of the Air Force. The base is named after Lieutenants Sainuel H. Davis and Oscar Monthan who were World War I pilots from Tucson. Davis-Monthan Air Force Base became a military base in 1925. The base has played an active role in the economy of the area. It is the second largest employer in the area, after the University of Arizona. Davis-Monthan Air Force Base includes the following military organizations: 355<sup>th</sup> Wing, which is comprised of the 355<sup>th</sup> Operations Group, the 355<sup>th</sup> Logistics Group, the 355<sup>th</sup> Medical Group and the 355<sup>th</sup> Support Group; Twelfth Air Force, Aerospace Maintenance and Regeneration Center, the 305<sup>th</sup> Rescue Squadron and the 162<sup>nd</sup> Fighter Wing Air National Guard. See Exhibit 3

(4) *Davis-Monthan Air Force Base has its own local government.* Because Davis-Monthan Air Force Base is a military installation, the normal structures of civilian

---

resident population of the school is estimated to be no more than 50 persons including students and staff.

government do not exist. The Air Force appoints a commander for the base. The current commander of Davis-Motithiin Air Force Base is Colonel Paul G. Schafer. Though the base is under a military command structure, it offers services similar to those that are offered to civilian communities such as housing, water, sewer, maintenance, public works, parks and recreation. The Air Force Base also offers medical, library and education services.

Among the Federal agencies that are located on the base include the Federal Aviation Administration, the United States Customs Service Air Service Branch, the United States Corp of Engineers, the Federal Law Enforcement Training Center and the Naval Air Systems Command. See Exhibit 3.

(5) *Davis-Monthan Air Force Base has its own zip code and separate governmental listings in the local telephone company.* There is a new U.S. Post Office and Postal Service Center located on the base providing a full range of postal services. The zip code designated for Davis-Monthan Air Force Base is 85707. Residential, military and business listings for Davis-Monthan Air Force Base are found in the Installation Guide/Telephone Directory published by Benchmark Publications. See Exhibit 3.

(6) *Davis-Monthan Air Force Base has its own commercial establishments and health facilities.* There are officers and enlisted clubs, a base exchange, a commissary, a post office, a dining facility, a gift shop, federal credit union, garage, gas station, garden shop, bowling center, base theater, dry cleaner, travel agency, thrift shop, and restaurants on the base. There is also The Inn on Davis-Monthan which accommodates visiting officers and airmen. Base housing consists of Kachina Village, 550-unit complex; the Palo Verde Village, which includes 701 units; and ten permanent dormitories. See Exhibit 3.

Health care on Davis-Monthan Air Force Base is provided by the 355<sup>th</sup> Medical Group, a medical treatment facility which offers a full range of medical and dental specialties. There is a 396-member staff including 50 physicians/physician extenders and 10 dentists. The facility averages more than 12,290 outpatient visits, 23,600 laboratory procedures and 40,626 prescriptions each month. Additionally, there is a Health and Wellness Center which offers awareness, education and intervention programs about topics such as nutrition, weight management, tobacco cessation, stress awareness, parenting and injury awareness. Davis-Monthan Air Force Base provides veterinary services for animals owned by active-duty personnel, retired members and dependents. See Exhibit 3.

Seven chaplains, two chapel centers and a flight line ministry handle religious needs on Davis-Monthan Air Force Base. Regular worship services are held on the base for Catholic, Protestant and Islamic personnel. See Exhibit 3.

The office of the Staff Judge Advocate provides legal counsel to commanders on all matters affecting the installation and its mission. The office provides legal assistance to active-duty members and their dependents and the sizable military retirees population in the area. See Exhibit 3.

(7) *Davis-Monthan Air Force Base is a separate and distinct advertising market from Tucson.* According to the newspaper serving the base, businesses can advertise in the *Desert Airman* which enables them to reach the residents of base and does not involve Tucson media sources. Residents may also access the *Desert Airman's* webpage to learn about community events and news. The Installation Guide/Telephone Directory published by Benchmark Publications contains advertising, inserts and supplements. Thus, the residents of

Davis-Monthan Air Force Base do not need to seek out Tucson media sources in order to find what is happening in their community.

(8) *Davis-Monthan Air Force Base has its own library and its police and fire protection are provided independent of any other jurisdiction.* Davis-Monthan Air Force Base operates a library for its base residents. The library is open Monday through Saturday. It has a meeting room, computer and Internet access and book-on-tape and video collections. The library has several programs for children. See Exhibit 3.

The Base Education Services Center provides families with help with both on-and off-base educational opportunities. Two Tucson Unified School District elementary schools, kindergarten through 5<sup>th</sup> grade, serve the base. The base provides busing for all secondary school students who attend middle and high schools off the base. See Exhibit 3.

The 355<sup>th</sup> Security Forces is the base military police department. Davis-Monthan Air Force Base maintains its own fire department. The Davis-Monthan Air Force Base Fire Department provides a variety of fire prevention and safety, ambulance, paramedic, search and rescue, EMT, HAZMAT and other services to city residents as well as educational programs. See Exhibit 3.

Davis-Monthan Air Force Base has a full range of parks and recreation services that are available to its base residents. The base offers picnicking, basketball courts, playgrounds and ball fields. The Blanchard Golf Course is an 18-hole course is located on base grounds. The Haefner Fitness and Sports Center offers indoor and outdoor recreation activities. The base operates a community center and a youth center. See Exhibit 3.

9. By deleting Channel 285C2 from Willcox, the loss area will contain unserved and underserved areas. In order to provide service to these areas, Lakeshore proposes to allot



Channels 283C2 and Channel 245C2 to Willcox. See Figures 7-11 and 12-15 of the Engineering Statement.

10. These two channels are proposed to be allotted at the same site at KWCX. Thus, there will not be any loss of service. In fact, if both channels are allotted to Willcox, then the entire current KWCX-FM 60 dBu service area will receive one additional service. Channel 283C2 can be allotted consistent with Section 73.207 of the Commission's Rules and the 1992 U.S./Mexican Treaty provided Channel 285C3 is allotted at Davis-Monthan Air Force Base as proposed. The appropriate Mexican protections are demonstrated in the Engineering Statement. Channel 245C2 can be allotted to Willcox based on the recent action in M B Docket 02-263 where the proposal to allot Channel 246C3 at Safford, Arizona was dismissed due to the petitioner's withdrawal of the only expression of interest. See DA 03-151, released January 21, 2003. To assure the Commission that the proceeding will be final, the petitioner Graham County FM Associates has provided a statement here reaffirming that it is no longer interested in the Safford channel and will not file a petition for reconsideration in that proceeding. See Exhibit I. Lakeshore hereby states that should Channels 283C2 and 245C2 be allotted to Willcox, it will file applications for both channels and will construct both stations if authorized to do so.

#### **CONFLICT WITH SELLS, ARIZONA**

11. In order to resolve the conflict with Channel 285A at Sells, the Engineering Statement indicates that Channel 249A can be allotted to Sells as an alternative channel. See Figure 19. If for any reason, Channel 249A cannot be allotted to Sells, Lakeshore asserts that under the Commission's priorities a First local service at Davis-Monthan Air Force Base (pop. 6,898) (Priority 3) should be favored over a second local service at Sells (which has Station

KOHN(FM). (Priority 4). See Revisions of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982).

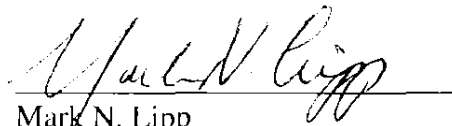
12. Lakeshore reiterates that should the Commission approve the reallocation of Channel 28.3C3 to Davis-Monthan Air Force Base, it will apply for the channel and construct the facility if authorized to do so.

### C. CONCLUSION

13. The reallocation of Channel 28.5C3 to Davis-Monthan Air Force Base is in the public interest because that community will receive a first local service and there will be a substantial gain in population. Furthermore, the residents of the Willcox area will continue to be served by several radio stations and can gain a station

Respectfully submitted,

LAKESHORE MEDIA, LLC



Mark N. Lipp  
Shook, Hardy & Bacon LLP  
600 14th Street, N.W., Suite 800  
Washington, D.C. 20005  
(202) 783-8400

Its Counsel

January 30, 2003



**ENGINEERING STATEMENT**

**IN SUPPORT OF A  
COUNTERPROPOSAL**

**MH DOCKET 02-376, DA 02-3361  
RM-10617**

**Lakeshore Media, LLC**

**Prepared by:**

**Reynolds Technical Associates  
12585 Old Highway 280 East, Suite 102  
Chelsea, Alabama 35043  
(205) 618-2020**

**January, 2003**

## Engineering Statement

### In **Support** a Counterproposal

**MB Docket 02-376, RM-10617 (DA 02-3361)**

**Channel 285C3 (KWCX), Davis-Monthan Air Force Base, Arizona**

#### General

The instant counterproposal is being filed by Lakeshore Media, LLC ("Lakeshore"), licensee of KWCX, channel 285C2, licensed to Willcox, Arizona. In MB Docket 02-376 Rural Pima Broadcasting requested the allotment of channel 285A at Sells, Arizona. Lakeshore hereby proposes the deletion of channel 285C2 at Willcox and the substitution of channel 285C3 at Davis-Monthan Air Force Base, Arizona as that community's first local service.

#### Exhibits Explained

Exhibit E. Figure 1 is an allocation study showing that the proposed allocation site, which is the reference coordinates for Davis-Monthan Air Force Base, is fully spaced to all facilities in the area with the exception of the proposed allotment of channel 285A at Sells and XHNIFM, channel 286B at Nogales, Sonora, Mexico. This makes the instant counterproposal mutually exclusive with the proposed allotment of channel 285A at Sells. Exhibit E. Figure 2 shows how the instant counterproposal would protect XHNIFM in accordance with the 1992 US/Mexican FM Broadcast Agreement. The proposed ERP of 0.8 kW in the direction of XHNIFM meets the Commission's requirement of no more than 15 dB minimum-to-maximum ratio.

Exhibit E, Figure 3 shows the 70 dBu contour of the class C3 facility proposed at Davis-Monthan Air Force Base. This map demonstrates that 100% coverage of the community with a city-grade signal.

Exhibit E, Figure 4 is a gain/loss study map and Exhibit E, Figure 5 is a map showing that no area will be unserved as a result of the proposed modifications. Exhibit E, Figure 6 is a list of the facilities shown in Exhibit E, Figure 5.

In order to prevent the deletion of channel 285C2 at Willcox from creating white area, Lakeshore proposes the allocation of channel 283C2 at the current KWCX licensed site. This allocation will prevent the creation of any unserved area as a result of channel 285C2 being deleted at Willcox.

Exhibit E, Figure 7 is an allocation study for channel 283C2 at Willcox that uses KWCX's licensed coordinates as reference. This study shows short spacing to channel to three different Mexican facilities.

Exhibit E, Figures 8, 9, and 10 demonstrate how the proposed allotment of channel 283C2 at Willcox will be able to protect XIICNEF, channel 284B at Cananea, Sonora; the vacant allotment on channel 283A at Los Moscos, Chihuahua; and the vacant allotment on channel 282B at Nogales, Sonora. Exhibit E, Figure 11 shows that the proposed allocation of channel 283C2 at Willcox covers 100% of that community.

To prevent the creation of any gray area as a result of the proposed changes to KWCX, Lakeshore also proposes the allotment of channel 245C2 (also at Willcox, AZ). Channel 245C2 will have the same reference coordinates as channel 283C2 (and, for that matter, KWCX's current licensed coordinates).

Exhibit E. Figure 12 is an allocation study showing that the only facilities that are short spaced to the proposed channel 245C2 at Willcox are Mexican facilities. Exhibit E, Figures 13 and 14 demonstrate how the proposed allocation can protect these Mexican facilities under the auspices of the 1992 US/Mexican treaty governing FM broadcasting. Exhibit E. Figure 15 shows that channel 245C2 would provide city-grade coverage to 100% of Willcox.

The other short spacing that the allocation of channel 285C3 at Davis-Monthan creates is to KZZP, channel 284C, Mesa, Arizona. The instant counterproposal seeks to modify the reference coordinates of KZZP in order to allow the allocation of channel 285C3 at Davis-Monthan AFB. Exhibit E. Figure 16 demonstrates that the modified reference coordinates for KZZP are fully spaced to all other facilities, both American and Mexican. Exhibit E, Figure 17 demonstrates that Mesa can still be covered by a class C 70 dBu contour from this new reference site. Exhibit E, Figure 18 is a gain/loss study map demonstrating the population and area gain and lost as a result of the modification of channel 284C at Mesa.

Channel 249A can be used instead of channel 285A at Sells, thereby eliminating the conflict between the instant counterproposal in the original PKM. Exhibit E, Figure 19 is an allocation study demonstrating the feasibility of channel 249A at Sells. Exhibit E, Figure 20 is a 70 dBu contour map showing that this site will continue to cover 100% of Sells.

### **Conclusion**

Lakeshore, in the instant counterproposal, proposes to allot KWCV at Davis-Monthan Air Force Base, Arizona as that community's first local service. Willcox, Arizona will

---

continue to be served by KHIL(AM), 1250 kHz, as **well** as the proposed allocations of channels 283C2 and 245C2. Sells, on the other hand, currently has a construction permit for a non-commercial class C1 facility (KOHN). In this counterproposal, Lakeshore offers channel 249A in lieu of channel 285A at Sells for use by Rural Pima Broadcasting.

**Statement of the Consultants**

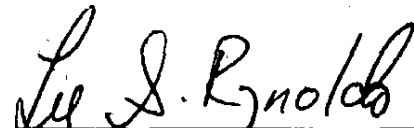
The instant engineering statement was prepared for Lakeshore Media, LLC ("Lakeshore") and supports a counterproposal to MB Docket 02-376. It was developed by Reynolds Technical Associates ("RTA") and may not be used for purposes other than submission to the Commission by RTA.

It may not be reproduced in its entirety, or in part, by anyone (other than from the Commission) without the written consent of RTA.

It is prepared for Lakeshore under contractual agreement, and its certification by **RTA** is used accordingly. If Lakeshore fails in its contractual obligation, RTA reserves the right to withdraw its certification.

The information in this application is compiled from the most recent Commission and outside data. RTA is not responsible for errors resulting from incorrect data or unpublished rule and procedure changes.

For KIA:

  
Lee S. Reynolds

January 18<sup>th</sup>, 2003

12585 Old Highway 280 East, Suite 102  
Chelsea, Alabama 35043  
(205) 618-2020



# Engineering Statement

## In Support a Counterproposal

**MB Docket 02-376, RM-10617 (DA 02-3361)**

### Channel 285C3 at Davis-Monthan Air Force Base Allocation Study

CLASS = C3 Int = B1				DISPLAY DATES		
Current Spacings				DATA 01-15-03		
Channel 285 - 104.9 MHz				SEARCH 01-19-03		
Call	Channel	Location	Dist	Azi	FCC	Margin
-----						
Community of	Davis-Monthan AFB	AZ	3.23	130.5		
Reference Coordinates:						
North Latitude: 32-10-58						
West Longitude: 110-52-23						
KWCXFM LIC 285C2	Willcox	AZ	121.82	88.9	177.0	-55.18
Of no concern:						
Licensed coordinates of KWCX						
XHNIFM OPE 2868	Nogales	SO	96.93	183.1	145.0	-48.07
ALLO 286	Nogales	SO	96.98	182.6	145.0	-48.02
Of concern:						
Protection afforded under the terms set forth in the						
1992 US/Mexican FM Broadcasting Treaty						
RADD ADD 285A	Sells	AZ	101.04	248.0	142.0	-40.96
Of concern:						
Proposed allocation of channel 285C3 at Davis-Monthan Air Force Base						
is mutually exclusive with the proposed allotment of						
channel 285A at Sells, Arizona.						
KZZP LIC 284C	Mesa	AZ	166.15	319.6	176.0	-9.85
Of concern:						
Reference coordinates of KZZP are modified in the						
instant counterproposal (see below).						
KZZP ADD 284C	Mesa	AZ	175.58	319.6	176.0	-0.42
Of note:						
Coordinates of KZZP modified in instant counterproposal.						
ALLO 284	Cananea	SO	136.93	157.1	145.0	1.93
XHCNEF OPE 284B	Cananea	SO	146.93	157.1	145.0	1.93
KZZZ LIC 287C2	Wearny	AZ	75.95	73.8	56.0	19.95
ALLO 282	Nogales	SO	96.98	182.6	71.0	25.98
AD283 ADD 283C2	Willcox	AZ	121.82	89.5	56.0	65.82
Of note:						
Proposed allotment in instant counterproposal'						
-----						

## Engineering Statement

### In Support of Counterproposal

**MB Docket 02-376, KM-10617 (DA 02-3361)**

Contour Protection with XHNIFM, Channel 286B, Nogales, Sonora, Mexico  
(In Accordance with **US/Mexico Treaty**)

#### Proposed Facility

Community : Davis-Monthan Air Force Base, Arizona  
Channel : 285  
Call : KWCX  
Class : C3  
International : B1  
Coordinates : 32-12-06; 110-53-57  
Radiating Center : 898.6 meters AMSL (100 meters HAAT)  
Azimuth to Protected Facility : 183 degrees  
Standard Radials : 180 HAAT: 71.3 meters  
: 225 HAAT: 123.7 meters  
Interpolated : 183 HAAT: 75.8 meters  
Restricted Power : 0.80 kW on 183 degree radial @ 75.8 meters HAAT  
Interfering Contour : F(50,10) 4X dBu  
Distance to Interfering Contour : **31.80 km**

#### Protected Facility at Nogales, SO, Mexico (XHNIFM)

Community : Nogales, Sonora  
Channel : 286  
Call : XHNIFM  
Class : B  
International : B  
Coordinates : 31-19-53; 110-57-17  
Maximum Facility : 50 kW at 150 meters HAAT  
Relationship : First-adjacent channel  
Protected Contour : F(50,50) 54 dBu  
Maximum distance allowed to protected contour : **65.10 km**

#### Summary

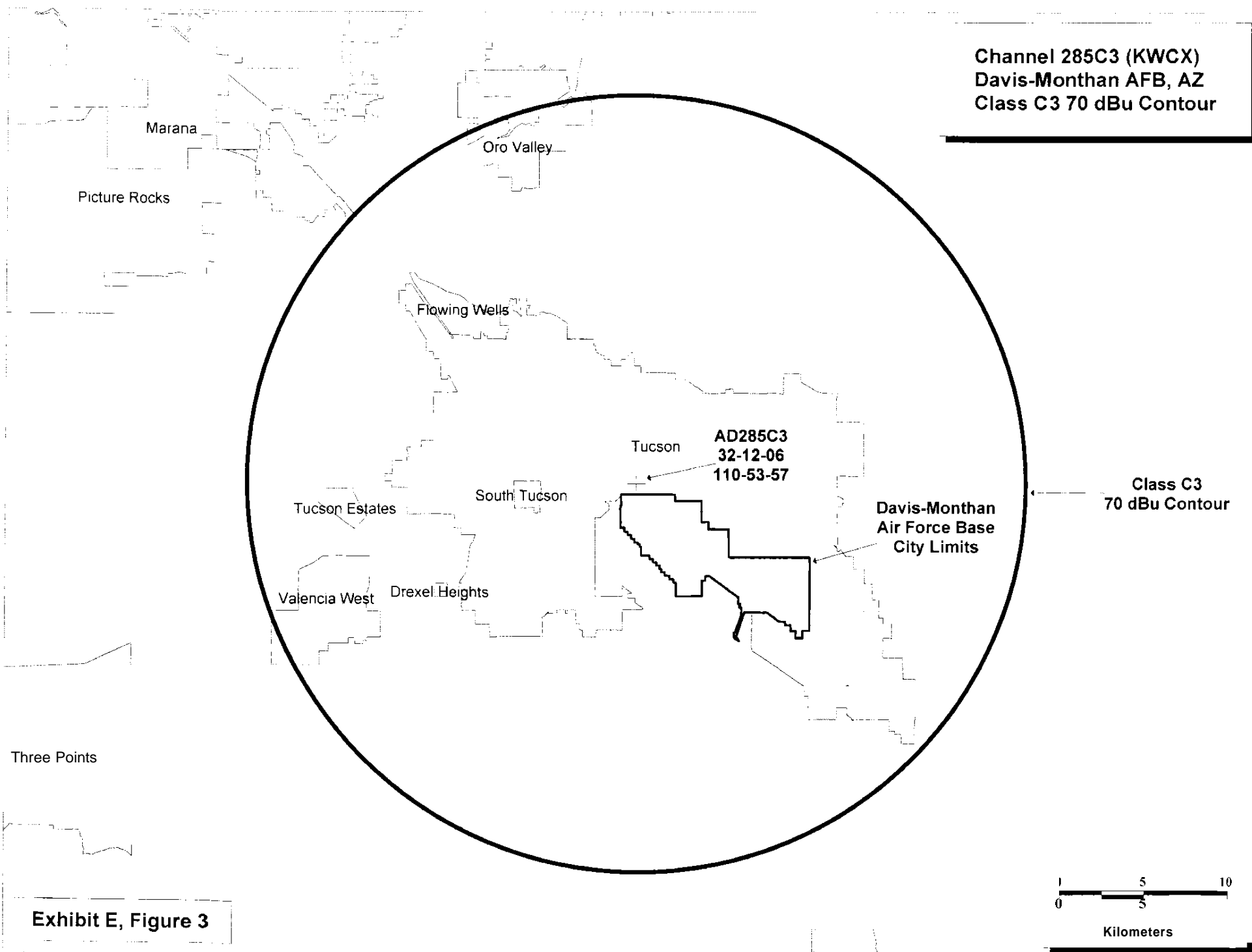
Distance to protected contour (XHNIFM)	65.10 km
Distance to restricted contour (KWCX)	31.80 km
Total distance restricted plus protected	96.90 km
Actual spacing	<b>06.93 km</b>

**Clearance 0.03 km**

No overlap of protected and interfering contour

**Exhibit E, Figure 2**

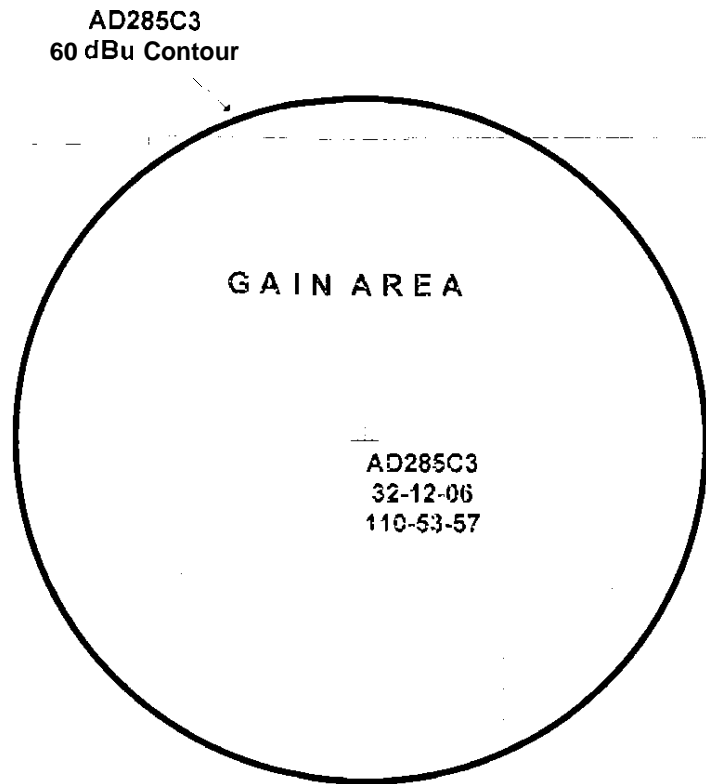
**Channel 285C3 (KWCX)  
Davis-Monthan AFB, AZ  
Class C3 70 dBu Contour**



**Exhibit E, Figure 3**

Gain Area = 5,016 sq km  
Loss Area = 8,940 sq km  
Pop. Gain = 813,043  
Pop. Loss = 13,045

Channel 285C3 (KWCX)  
Davis-Monthan AFB, AZ  
Gain/Loss Study Map



KWCX.L  
60 dBu Contour

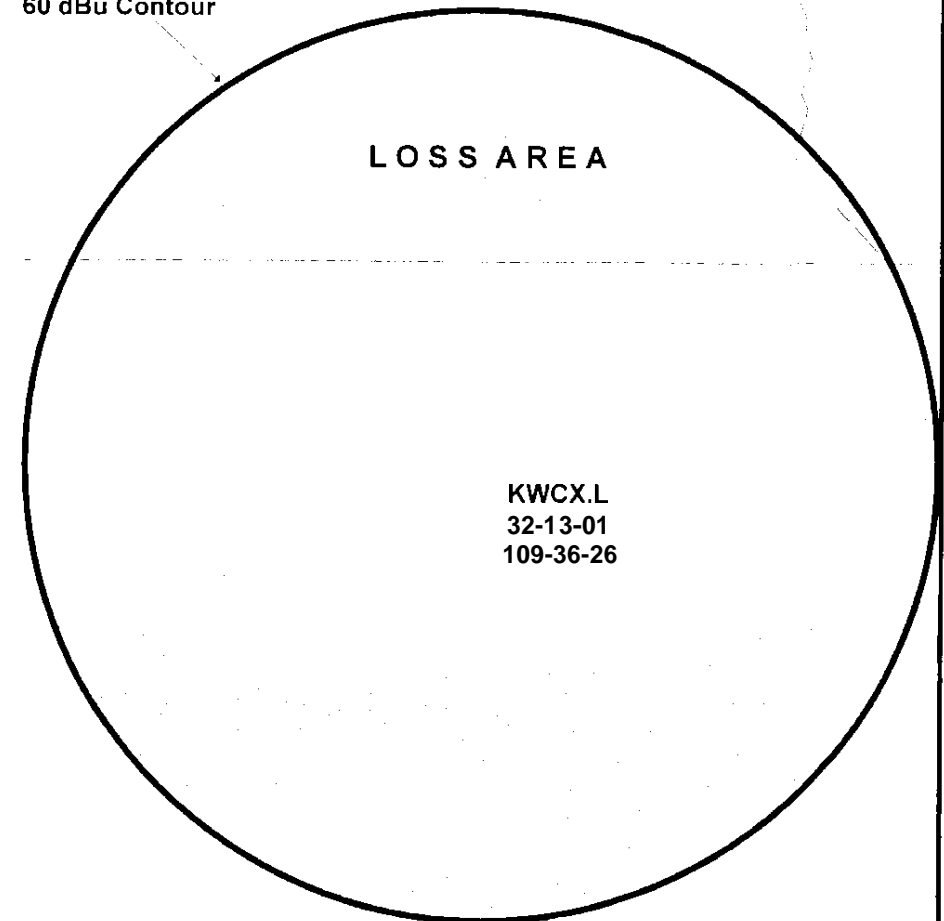
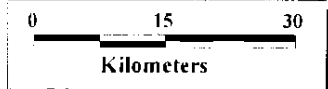


Exhibit E, Figure 4



Channel 285C3 (KWCX)  
Davis-Monthan AFB, AZ  
Remaining Services Study Map

LOSS

AREA

4/5

3

6

8

2

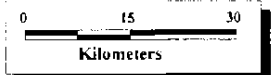
9

10

1/11

7

Exhibit E, Figure 5



## Engineering Statement

### In Support a Counterproposal

MH Docket 02-376, RM-10617 (DA 02-3361)

#### List of Facilities in the KWCX Remaining Services Study

<u>Number</u>	<u>Facility</u>	<u>Channel</u>	<u>City, State</u>
	Proposed Allotment	283C2	Willcox, AZ
2	KXKQ	231C1	Safford, AZ
3	KFMM	256C	Thatcher, AZ
4	KSAF	264C1	Duncan, AZ
	KWRQ	272C1	Clifton, AZ
6	KPSA	250C	Lordsburg, NM
	KWRB	215C2	Sierra Vista, AZ
8	KKYZ	269C1	Sierra Vista, AZ
9	KAVV	249A	Benson, AZ
10	Vacant Allotment	22363	Willcox, AZ
11	Proposed Allotment	245C2	Willcox, AZ

# Engineering Statement

## In Support a Counterproposal

**MR Docket 02-376, RM-10617 (DA 02-3361)**

### Channel 283C2 at Willcox, Arizona Allocation Study

REFERENCE				DISPLAY DATES				
32 13 01 N				CLASS : C2 Int = B				DATA 01-15-03
109 36 26 W				Current Spacings				SEARCH 01-19-03
----- Channel 245 - 96.9 MHz -----								
Call	Channel	Location		Dist	Azi	FCC	Margin	
	Community of Willcox		AZ	21.49	280.7			
	Reference Coordinates:							
	North Latitude: 32-15-09							
	West Longitude: 09-49-53							
KWCX	LIC 285C2	Willcox	AZ	0.00	0.0	58.0	-58.00	
	Of no concern:							
	Licensed facility of KWCX							
ALLO	284	Cananea	SO	152.13	205.7	164.0	-11.87	
XHCNEF	OPE 284B	Cananea	SO	152.13	205.7	164.0	-11.87	
ALLO	283	Los Moscos	CH	157.05	118.2	163.0	-5.95	
ALLO	282	Nogales	SO	160.33	232.4	164.0	-3.67	
	Of concern:							
	Protection afforded under the terms set forth in the							
	1992 US/Mexican FM Broadcasting Treaty							
KNMA	LIC 283A	Reserve	NM	183.30	15.1	166.0	11.30	
AD285	ADD 285C3	Davis-Monthan AFB	AZ	121.82	269.5	56.0	65.82	
	Of note:							
	Modified coordinates and class for KWCX							
	in instant counterproposal							
KZZP	LIC 284C	Mesa	AZ	261.07	299.1	188.0	73.07	
	Of note:							
	KZZP's coordinates modified in instant counterproposal							
	(see below)							
KZZP	ADD 284C	Mesa	AZ	269.86	299.9	188.0	81.86	
	Of note:							
	Proposed modified coordinates for KZZP							

## Engineering Statement

### In Support a Counterproposal

**M B Docket 02-376, RM-10617 (DA 02-3361)**

#### **Contour Protection with XHCNEF, Channel 284B, Cananea, Sonora, Mexico (In Accordance with US/Mexico Treaty)**

##### **Proposed Facility**

Community : Willcox, Arizona  
Channel : 283  
Call : **AD283**  
Class : C2  
International : B  
Coordinates : 32-13-01; 109-36-26  
Radiating Center : 1640.6 meters AMSL (150 meters **HAAT**)  
Azimuth to Protected Facility : 206 degrees  
Standard Radials : 180 **HAAT:** 144.9 meters  
: 225 **HAAT:** 243.0 meters  
Interpolated : 206 **HAAT:** 201.6 meters  
Restricted Power : 14 kW on 206 degree radial @ 201.6 meters **HAAT**  
Interfering Contour : F(50,10) 48 dBu  
**Distance to Interfering Contour : 86.5 km**

##### **Protected Facility at Cananea, SO, Mexico (XHCNEF)**

Community : Nogales, Sonora  
Channel : 286  
Call : XHCNEF  
Class : B  
International : B  
Coordinates : 30-58-57; 110-18-01  
Maximum Facility : 50 kW at 150 meters **HAAT**  
Relationship : First-adjacent channel  
Protected Contour : F(50,50) 54 dBu  
**Maximum distance allowed to protected contour : 65.10 km**

##### **Summary**

Distance to protected contour (XHCNEF)	65.10 km
Distance to restricted contour (AD283)	86.50 km
Total distance restricted plus protected	151.60 km
Actual spacing	152.10 km

**Clearance 0.50 km**

**No overlap of protected and interfering contour**



## Engineering Statement

### In Support a Counterproposal

**MB Docket 02-376, RM-10617 (DA 02-3361)**

Contour Protection with Vacant Allotment, Channel 283A, Los Moscos, Chihuahua, Mexico  
(In Accordance with US/Mexico Treaty)

#### Proposed Facility

Community : Willcox, Arizona  
Channel : 283  
Call : AD283  
Class : C2  
International : B  
Coordinates : 32-13-01:109-36-26  
Radiating Center : 1640.6 meters AMSL (150 meters HAAT)  
Azimuth to Protected Facility : 118 degrees  
Standard Radials : 90 HAAT: 30.0 meters\*  
: 135 HAAT: 30.0 meters\*  
Interpolated : 118 HAAT: 30.0 meters  
Restricted Power : 50 kW on 118 degree radial @ 30.0 meters HAAT  
Interfering Contour : F(50,10) 40 dBu  
Distance to Interfering Contour : 115.0 km

\* Values are actually less than 30 meters; assumed to be 30 meters for this study

#### Protected Facility at Los Moscos, CH, Mexico (Vacant Allotment)

Community : Los Moscos, CH  
Channel : 283  
Call : Vacant Allotment  
Class : A  
International : A  
Coordinates : 31-32-24:108-08-50  
Maximum Facility : 6 kW at 100 meters HAAT  
Relationship : Co-channel  
Protected Contour : F(50,50) 60 dBu  
**Maximum distance allowed to protected contour : 28.3 km**

#### Summary

Distance to protected contour (Vacant Allotment):	28.30 km
Distance to restricted contour (AD283)	115.00 km
Total distance restricted plus protected	143.30 km
Actual spacing	157.05 km

Clearance 13.75 km

**No overlap of protected and interfering contour**